

EXHIBIT GG



Controlled Substances Suspicious Order Monitoring

Purpose

DEA regulations require distributors of controlled substances to have a system in place designed to identify suspicious orders of controlled substances. This guidance document will outline the role of Practice Compliance in evaluating orders of interest and reporting suspicious orders to the appropriate federal and state agencies.

Definitions

Order of Interest: An order that warrants follow-up evaluation to determine whether it is suspicious

Suspicious Order: An Order of Interest which has been evaluated and determined to be suspicious. Suspicious Orders may include, but are not limited to, orders of unusual size, orders deviating substantially from a normal pattern and orders of unusual frequency.

Procedures

Initial Evaluation

All controlled substance orders submitted to a Walmart pharmacy distribution center will be monitored and Orders of Interest will be identified. Order of Interest initial evaluations will be conducted by the Pharmacy Logistics Compliance team in accordance with Pharmacy Manual XX-XXX (Logistics) and Pharmacy Logistics Procedures. At a high level, the following steps may be taken to evaluate an Order of Interest:

- Determine the unusual characteristics of the order
- Review prior order history
- Interview store/club associates
- Verify information provided by store/club associates
- Review any prior concerns regarding the pharmacy in question (if applicable)

Additional Evaluation

If an Order of Interest is not resolved within 4 business days or if the Pharmacy Logistics Compliance team determines that an additional evaluation is needed, the Director of Controlled Substances ("Director") will perform an additional evaluation. The determination of whether the Order of Interest is a Suspicious Order will be made by agreement of the Director and the Sr. Director of Pharmacy Logistics ("Sr. Director"). The additional evaluation shall include, at a minimum, a review of all notes from the Pharmacy Logistics Compliance team's evaluation. The Director or Sr. Director may request additional information to aid in their determination if an Order of Interest is a Suspicious Order.



Controlled Substances Suspicious Order Monitoring

Determination

The Director and Sr. Director will have no longer than 2 business days to determine if the Order of Interest is appropriate or is a Suspicious Order.

If the Order of Interest is determined to be appropriate, Pharmacy Logistics will be notified that they may ship the order. If the Order of Interest is determined to be a Suspicious Order, the Director will be responsible for reporting the Suspicious Order to key stakeholders, the Drug Enforcement Agency (DEA) and state agencies as required by law.

Suspicious Order Reporting

The Director will report the Suspicious Order to DEA and state agencies (as required) when discovered. The report will be made on the Suspicious Order Regulatory Reporting Form, as approved by Health & Wellness Legal.

Documentation

The Director will document the final conclusion of the evaluation, including why the order was determined to be appropriate or suspicious. The Director will also retain notes and documentation of any reports made to the DEA and state agencies

Oversight

The following oversight activities will be conducted to ensure the effectiveness of the Suspicious Order Monitoring Program:

- Director will conduct a post-determination review of all Order of Interest evaluations conducted by the Pharmacy Logistics Compliance team including, if applicable, all evaluation notes.
- Director will present a summary report of Order of Interest evaluations to the Controlled Substance Advisory Panel ("Panel") on a regular basis.
- Director will periodically compare the Order of Interest thresholds with DEA 106 filings and make recommendations of threshold adjustments due to theft or significant loss in the subject pharmacy. Threshold adjustments must be approved by both the Director and Sr. Director and documented.
- Director may make recommendations to the Panel for additional oversight of certain pharmacies due to a Suspicious Order or an Order of Interest that was determined not to be suspicious. Additional oversight may include, but is not limited to, a lower order threshold on one or more items, more frequent evaluation of orders, or blocks being placed on the order of specific drugs.



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Resources

- Suspicious Order Reporting Regulatory Form
- State Reporting Requirements